

April 9, 2018

*Via Electronic Filing*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth St., SW  
Washington, DC 20554

*Re: Notice of Ex Parte Presentation – ET Docket No. 17-215; ET Docket No. 15-170*

Dear Ms. Dortch:

On April 5, 2018, Brian Markwalter, Senior Vice President, Research and Standards, Consumer Technology Association (CTA), Mike Bergman, Senior Director, Technology & Standards, CTA, and Rachel Nemeth, Director, Regulatory Affairs, CTA, along with Megan Anne Stull, Counsel, Google, Holly Evans, Senior Attorney, Microsoft, and Rob Kubik, Director of Public Policy, Engineering & Technology, Samsung Electronics met with Walter Johnston, Rashmi Doshi, Jamison Prime, William Hurst, and Axel Rodriguez of the Office of Engineering and Technology.

Commission staff and meeting participants discussed issues arising from marketing restrictions in Section 2.803 of the Commission's rules. CTA stated that the Commission should clarify or modify its rules to allow companies to undertake marketing activities that are necessary to assess market demand and allocate products for global launches. Google and Microsoft discussed how changes to Commission policies are needed to assess market demand for devices prior to certification and ensure proper supply chain allocations and fulfillment of customer expectations at launch.

Google also reiterated its position that the FCC should allow importation of uncertified devices to facilities owned by either a responsible party or an importer contracted by a responsible party prior to receipt of the devices' regulatory authorizations.<sup>1</sup> These facilities could maintain records that could be made available to the Commission or Customs and Border Patrol upon request. The devices would remain at the facilities until receipt of their regulatory authorization. Executing these changes would provide more flexible importation options for manufacturers and could stoke price competition among importers for use of warehouse facilities, lowering importation expenses.

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<sup>1</sup> See Comments of Google Inc. in ET Docket No. 15-170 and RM-11673 at 21-22 (filed Oct. 9, 2015).

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office and a copy of this submission is being provided to meeting attendees from the Commission. Please let the undersigned know if you have any questions regarding this filing.

Respectfully Submitted,

CONSUMER TECHNOLOGY ASSOCIATION

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